REMARKS

The Office Action of November 26, 2004 has been reviewed and the comments therein were carefully considered. Claims 1-32 remain pending in the instant application.

Rejections under 35 USC §102

Claims 1-9, 11-20, 22-29, and 31-32 stand rejected under 35 USC 102(e) as being anticipated by *Stoub*, U.S. Pat. No 6,389,437 B2 filed on 01/1998 (hereinafter "*Stoub*"). Applicants respectfully traverse.

With respect to claims 1 and 12, the office action alleges that *Stoub* discloses each feature of the claimed invention. Applicants submit that *Stoub* fails to teach or suggest a method or apparatus wherein "the modified variables are optimized for readability" as recited in claims 1 and 12. *Stoub*, which is directed to converting a scrollable electronic document into a non-scrollable format, fails to teach this step and merely shows that "any change in the size of the font may alter the maximum number of columns 37 that can be displayed in the display window 17 while retaining the desired width characteristics for the columns 37." See *Stoub*, column 6, lines 38-41.

The Office Action indicates that the claimed element of "the modified variables are optimized for readability" may be found at col. 3, lines 39-41 of *Stoub*. The Office Action states that *Stoub* at col. 3, lines 39-41 "teaches allowing a user to modify font size to enhance readability of on-screen presentation of information." Office Action at page 3, lines 9-10. Furthermore, the Office Action states "Stoub does teach changing the font size within the document and automatically adjusting the format screen of the documents to enhance the view of the document (col.4, lines 31-39 and col. 11, lines 23-42)." Office Action at page 9, lines 4-6.

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However, with regard to independent claims 1 and 12, *Stoub* fails to disclose, teach, or suggest that "in response to a) modifying at least a portion of the plurality of formatting variables, **other than the variable specified in a)**, such that the modified variables are optimized for readability." (Emphasis added). The cited section in *Stoub* at column 4 lines 31-39 states:

> providing such a system and method for permitting a user to selectively enlarge information printed in small fonts such that the material can be easily read while the user sits at a comfortable viewing distance from the monitor; providing such a system and method for automatically recalculating the number of displayed columns in response to a user change in size of displayed font;

The above cited section in *Stoub* merely discusses printed material that can be easily read while the user sits at a comfortable viewing distance from the monitor. The cited section fails to disclose, teach, or suggest "modifying at least a portion of the plurality of formatting variables, **other than the variable specified in a)**, such that the modified variables are **optimized for readability**." (Emphasis added). The Applicants respectfully submit that "easily read" may not be equated with "optimized for readability."

Moreover, the cited section in *Stoub* at column 11 lines 23-42 states:

> In other words, the system 1 may provide an expedited method for changing font size while maintaining readability by maintaining a standard number of characters per line, as follows: (i) changing font size steps by accepting user input for stepping base font size up or down, keyboard input (e.g. up or down arrow keys), or graphical user interface "button" elements 45, 47; (ii) limiting the range of base font sizes (e.g., 8-point to 96-point fonts), (iii) limiting user input to defined range of font sizes, or (iv) modifying the base font size. Then, maintaining readability by (i) recalculating the number of columns 37 for the displayed font size using the newly current base font size as hereinbefore described for calculating the number of columns 37 for the displayed font size, (ii) recomposing the screen page 27 in accordance with the recalculated number of columns 37 as hereinbefore described for composing the screen page 27 as an array of columns 34; and (iii) resizing text and graphics in accordance with the recomposition of

the screen page 27 as hereinbefore described for resizing of text
elements and resizing of graphics images.

The above cited section in *Stoub* merely discusses changing font size while maintaining

readability.   The readability is maintained utilizing a standard number of characters per line.

The cited section fails to disclose, teach, or suggest "modifying at least a portion of the plurality

of formatting variables, **other than the variable specified in a)**, such that the modified variables

are **optimized for readability**." (Emphasis added).   The Applicants respectfully submit that

"maintaining readability" may not be equated with "optimized for readability." Therefore, for at

least this reason, Applicants respectfully submit that claims 1 and 12 are distinguishable over

Stoub.

Moreover, independent claims 1 and 12 are distinguishable over *Stoub* for at least one

additional reason. *Stoub* indicates that any changes made to the text display are not for the

purpose of optimizing readability, but rather are constrained by a requirement that a desired

number of characters per line be maintained:

> It is also to be understood that when the font-sizing mechanism 43
> is activated to alter the font size as hereinbefore described, not only
> does the screen page formatting mechanism 23 automatically
> recalculate the physical width of the columns 37 to thereby
> maintain the desired number of characters per line and also
> automatically reformat the new number of columns 37 into screen
> page 27, the display page formatting mechanism 25 also
> automatically redetermines the specific text 59, 60, 61 of the
> source document 33 to be displayed in each of the columns 37 of
> each of the display pages 57.

Stoub at col. 7, lines 25-35. Because *Stoub* imposes limits on the modifications that can be made

to the display, it cannot be considered as "modifying at least a portion of the plurality of

formatting variables, other than the variable specified in a), such that the modified variables are

optimized for readability" as recited in claims 1 and 12, respectively. Thus, claim 1 is allowable

over *Stoub*. Claims 2-11 each depend from claim 1 and are allowable as being dependent on an

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allowable base claim and further in view of the additional features recited therein. Claims 13-22 each depend from claim 12 and are also allowable as being dependent on an allowable base claim.

With respect to claim 23, the office action alleges that *Stoub* teaches each feature of the claimed invention. Applicants respectfully traverse this rejection. Similar to claims 1 and 12, claim 23 has includes the feature of "the modified variables are optimized for readability." As discussed in connection with claims 1 and 12, *Stoub* fails to teach or suggest at least this claimed feature. Accordingly, claim 23 is allowable over *Stoub* for substantially the same reasons as claims 1 and 12. Claims 24-31 depend from claim 23 and are also allowable as being dependent on an allowable base claim.

With respect to claim 32, the office action alleges that *Stoub* teaches each feature of the invention recited therein. Like the previously discussed independent claims, claim 32 includes the feature wherein "the modified variables are optimized for readability." Accordingly, Applicants submit that claim 32 is allowable for substantially the same reasons as claims 1, 12, and 23.

Rejections under 35 USC §103

Claims 10, 21, and 30 stand rejected under 35 USC 103(a) as being patentable over *Stoub*, as applied to claims 1-9, 11-20, 22-29, and 31-32, in view of *Chang* et al. U.S. Patent No. 6,584,479.

In view of the above remarks with respect to independent claims 1, 12, and 23, Applicants respectfully submit that dependent claims 10, 21, and 30 are also patentably distinct for at least the same reason as the independent claims from which they ultimately depend.
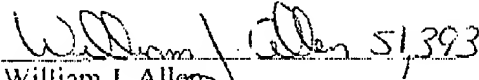
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Accordingly, Applicants respectfully request withdrawal of the rejection for depending claims 10, 21 and 30.

In view of the above discussion, Applicants respectfully submit that the remaining claims are in condition for allowance. Reconsideration and allowance of all remaining claims is respectfully requested. Should the Examiner believe that a conversation with the Applicant's representative would be useful in the prosecution of this case, the Examiner is invited and encouraged to call the Applicant's representative.

Respectfully submitted,

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